

October 9, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G011/M-14-369

Dear Dr. Haar:

Attached are the *Response Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

A Request by Minnesota Energy Resources Corporation (MERC or the Company) for Approval of the Company's 2013 Natural Gas Conservation Improvement Program Tracker Account, Including a Proposed 2013 Demand Side Management Financial Incentive and a revised Conservation Cost Recovery Adjustment (*petition*).

The *Petition* was filed on May 1, 2014 by:

Jim Phillippo  
Program Manager, Energy Efficiency Programs  
Minnesota Energy Resources Corporation  
2665 145th Street West  
Rosemount, Minnesota 55068-0455

The Department continues to recommend **approval, with modification**. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ HOLLY LAHD  
Rates Analyst

HL/ja  
Attachment



## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

### RESPONSE COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET No. G011/M-14-369

#### I. SUMMARY OF DOCKET AND DEPARTMENT RECOMMENDATIONS

On May 1, 2014, Minnesota Energy Resources Corporation (MERC or the Company) submitted its annual Conservation Improvement Program (CIP) report (*Petition*) for 2013 with the Minnesota Public Utilities Commission (Commission) in Docket No. G011/M-14-369. On August 25, 2014, the Company filed a revised *Petition*, correcting errors in its CIP tracker accounts and Demand Side Management (DSM) financial incentive.

On September 2, 2014, The Minnesota Department of Commerce (Department) submitted its initial *Comments* on MERC's petition. In these *Comments*, the Department recommended that the Commission:

- 1) approve MERC's 2013 DSM financial incentive of \$2,492,730 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;
- 2) approve MERC's 2013 CIP tracker account activities as summarized in Tables 1, 2, and 3 in the Department's *Comments*;
- 3) approve the revised gas Conservation Cost Recovery Adjustment (CCRA) of \$0.00554 per therm for all of MERC's Minnesota customer classes, to be effective January 1, 2015, or on the first billing cycle in the next full month after Commission approval, whichever is later. The approval is conditioned on the Company submitting, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations;
- 4) require MERC to include the following bill message (with the appropriate date) following the date of the *Order* in the present docket, or January 1, 2015, whichever is later:

Effective [insert date], a CCRA (conservation cost recovery adjustment) has been included on your bill. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses. Effective [insert date], the CCRA rate will be \$0.00554 per therm;

- 5) find that MERC has complied with the Commission's Order in Docket No. G011/M-13-369 regarding the filing of conservation cost repayment and adjustment schedules; and
- 6) eliminate the carrying charge MERC applies to the CIP tracker balance beginning with the month following the date of the Commission's Order.

In the event that the Commission decides not to eliminate carrying charges on the entire CIP tracker account, the Department recommends that the Commission not allow carrying charges on MERC's DSM financial incentive.

On September 12, 2014, the Company filed *reply comments*, in which they agreed with the Department's recommendations on approval of the DSM financial incentive, the 2013 CIP tracker accounts, and the Department's revised CCRA of \$0.00554 per therm. However, the Company disagreed with the Department's recommendation that the Commission disallow carrying charges on the CIP tracker account going forward. The Company did state that the Department's alternative recommendation to disallow carrying charges on the DSM financial incentive is a reasonable compromise.

In their *Reply Comments* the Company also recommended that the implementation of the updated CCRA rate of \$0.00554 be delayed beyond January 1, 2015, to coincide with the implementation of final rates in the Company's current general rate case.

On September 15, 2014, the Company filed a compliance filing in Docket No. G011/M-13-369. In the compliance filing the Company notified the Commission that the Company had suspended CCRA collection for MERC-PNG customers because the tracker balance reached zero in June 2014; the CCRA suspension is in compliance with the Commission's December 13, 2013 *Order* in Docket No. G011/M-13-369.

As indicated in the Company's compliance filing, while the MERC-PNG tracker reached zero in June 2014, the tracker balance reached a negative balance of (\$1,778,284.51) in August 2014 for two reasons: the Company did not suspend the CCRA collection for MERC-PNG customers until September 2014, and the Company credited the MERC-PNG tracker for uncollected conservation costs attributable to MERC customer Northshore Mining from July 2006 through December 2013 when Northshore Mining was not yet CIP-exempt. The Company proposed to refund MERC-PNG customers for the CIP expense over-collection. The Company anticipates that the CIP tracker account refund will be credited on customers' November 2014 bills.

In the sections below the Department responds to the Company's *Reply Comments* regarding carrying charges and CCRA implementation date.

## II. CARRYING CHARGES

The Department continues to recommend that the Commission eliminate the carrying charge MERC applies to the CIP tracker balance beginning with the month following the date of the Commission's Order.

The Department notes that the Commission recently approved a carrying charge rate set at Otter Tail Power's short term cost of debt.<sup>1</sup> The Department continues to recommend full elimination of carrying charges in this docket due to differences between MERC's and Otter Tail Power's CCRAs and CIP tracker accounts. One difference is whether or not the proposed CCRA is designed to achieve full CIP expense and DSM financial incentive recovery for the Company. In Otter Tail Power's case, the CCRA was not designed to achieve full CIP expense and DSM financial incentive recovery. MERC's proposed CCRA is designed to get the CIP tracker account balance to zero by the end of 2015 to ensure timely and efficient cost recovery. Therefore, the Company's risk of under-recovery within the recovery period is much lower than in the case of Otter Tail Power's CIP expenses.

In the past few years the Department has worked with the Company to reduce the Company's CIP tracker account balances and carrying charges by recommending higher CCRA rates than the Company has proposed. Reducing the CIP tracker account year-end balances has been complicated by the Company's ongoing MERC-NMU and MERC-PNG CIP consolidation, and the continued recovery of CIP expenses from large customers that either had temporary suspensions of CIP cost responsibility, or were incorrectly treated as CIP exempt.

In their *Reply Comments* MERC stated that carrying charges continue to serve an important purpose in providing protection to the risk associated with regulatory lag. It is true that the Commission did not approve updated CCRA rates for MERC-NMU and MERC-PNG for approximately 3 years.<sup>2</sup> During that time period, MERC added approximately \$1.5 million in net carrying charges to its CIP tracker accounts. The Department concludes that, in MERC's case, the regulatory lag experienced in the Company's CIP tracker accounts is due in part to the Company's actions and errors in the CIP tracker account and related dockets. These actions include:

---

<sup>1</sup> September 26, 2014 *Order* in Docket No. E017/M-14-201.

<sup>2</sup> The Commission approved updated CCRA rates for MERC-PNG in Docket No. G011/M-13-369 and for MERC-NMU in Docket No. G007/M-13-369 in its December 13, 2013 *Orders*. MERC's previous CCRA rates were last approved for MERC-PNG in Docket No. G011/M-10-407 and MERC-NMU in Docket No. G007/M-10-409 in the Commission's October 11, 2010 *Orders* in those dockets.

1. *Treating certain large customers as CIP exempt when they were not;*<sup>3</sup>
2. *Making mistakes in calculating the requested 2013 DSM financial incentive and updated CCRA rate;*<sup>4</sup>
3. *Requesting a 1.5 year amortization period to recover ongoing CIP expenses.*<sup>5</sup> Amortizing expenses over a period longer than one year results in a lower CCRA rate but higher overall carrying charges for the Company;
4. *Failing to credit the carrying charge to ratepayers when the carrying charge was in the customer's favor.*  
In its 2011 and 2012 CIP tracker accounts, MERC-NMU did not credit a carrying charge to the account when CIP recoveries exceeded expenses. The Department recommended the Company correct this error in both the Department's 2011 and 2012 CIP tracker account comments.<sup>6</sup> The Company did correct the error after the Department's second set of comments on the matter.
5. *Failing to suspend the CCRA collection in 2014 when the PNG and NMU tracker balances reached zero per Commission Order in a timely manner.*<sup>7</sup>

### III. CCRA IMPLEMENTATION DATE

In *Reply Comments* MERC recommended that the updated CCRA implementation be delayed pending the Commission's decision on CIP expenses in MERC's current rate case (G011/GR-13-617). On September 23, 2014, the Commission deliberated on MERC's rate case. Based on the Department's understanding of the Commission's oral decision on CIP expenses, it's the Department's understanding that the Commission's decision on the level and recovery of CIP expenses is consistent with current practice, and therefore there is no need to delay implementation of the proposed CCRA. After discussion with the Department, the Company indicated via an October 2, 2014 email that MERC is no longer requesting a delay in the CCRA implementation.

Therefore, the Department continues to recommend that the proposed CCRA be effective January 1, 2015, or on the first billing cycle in the next full month following the Commission's Order in the present docket, whichever is later.

---

<sup>3</sup> See MERC's 2010 rate case (G007,011/GR-10-977) and MERC's 2013 rate case (G011/GR-13-617).

<sup>4</sup> See MERC's revised initial filing and Department comments in the current docket (G011/M/14-369).

<sup>5</sup> See MERC's initial filings in Docket Nos. G007/M-11-406, G011/M-11-407, G007/M-12-443, G011/M-12-444, G007/M-13-370, and G011/M-13-369.

<sup>6</sup> Docket No. G007/M-13-370. See Department's September 30, 2013 *Comments* and the Company's October 9, 2013 *Reply Comments*.

<sup>7</sup> See Commission Orders in Docket Nos. G007/M-13-370 and G011/M-13-369, and the Company's refund compliance filings in those dockets.

#### IV. CORRECTION TO TABLE 7 IN INITIAL COMMENTS

The Department identified an error in *Table 7: History of MERC's CIP Achievements, Expenditures, and Incentives* of the Department's initial comments in this docket. The Company's combined 2010 CIP expenditures total should be \$7,549,257 instead of \$19,349,257; correcting this error in the 2010 CIP expenditures also impacts the *Carrying Charges as a percent of CIP Expenditures* and the *Average Cost per Mcf Saved* metrics. The updated Table 7 listed below includes the correct 2010 combined CIP expenditures and associated metrics for both MERC-NMU and MERC-PNG.

**Updated Table 7: History of MERC's CIP Achievements, Expenditures, and Incentives**

Category	2008	2009	2010	2011	2012	2013
DSM Financial Incentive	-	\$ 582,288	\$2,322,658	\$2,587,948	\$2,729,531	\$2,492,730
Incentive as a % of CIP Expenditures	0%	19%	31%	32%	27%	30%
Carrying Charges	\$ 136,886	\$ 396,940	\$ 616,967	\$ 592,929	\$ 496,537	\$ 424,887
Carrying Charges as a % of CIP Expenditures	6%	13%	8%	7%	5%	5%
Year-End Tracker Balance	\$5,008,036	\$8,183,421	\$12,686,756	\$10,086,519	\$11,633,350	\$14,781,047
CIP Expenditures (as reported in status reports)	\$ 2,476,407	\$ 3,122,758	\$ 7,549,257	\$ 8,067,173	\$ 9,951,018	\$ 8,353,283
Achieved Energy Savings (Mcf)	64,517	133,570	449,441	457,747	534,596	424,827
Average Cost per Mcf Saved	\$ 38.38	\$ 23.38	\$ 16.80	\$ 17.62	\$ 18.61	\$ 19.66

#### V. THE DEPARTMENT'S RECOMMENDATIONS

The Department continues to recommend that the Commission:

- 1) approve MERC's 2013 DSM financial incentive of \$2,492,730 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;
- 2) approve MERC's 2013 CIP tracker account activities as summarized in Tables 1, 2, and 3 of the Department's September 2, 2014 *Comments*;
- 3) approve the revised gas CCRA of \$0.00554 per therm for all of MERCs Minnesota customer classes, to be effective January 1, 2015, or on the first billing cycle in the next full month after Commission approval, whichever is later. The approval is conditioned on the Company submitting, within 10 days of the

issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations;

- 4) require MERC to include the following bill message (with the appropriate date) following the date of the *Order* in the present docket, or January 1, 2015, whichever is later:

Effective [insert date], a CCRA (conservation cost recovery adjustment) has been included on your bill. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses. Effective [insert date], the CCRA rate will be \$0.00554 per therm;

- 5) find that MERC has complied with the Commission's Order in Docket No. G011/M-13-369 regarding the filing of conservation cost repayment and adjustment schedules; and
- 6) eliminate the carrying charge MERC applies to the CIP tracker balance beginning with the month following the date of the Commission's Order.

In the event that the Commission decides not to eliminate carrying charges on the entire CIP tracker account, the Department recommends that the Commission not allow carrying charges on MERC's DSM financial incentive.

/ja

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Response Comments**

**Docket No. G011/M-14-369**

Dated this 9<sup>th</sup> day of October 2014

**/s/Sharon Ferguson**



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Agriesti	gagriesti@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_14-369_M-14-369
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_14-369_M-14-369
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-369_M-14-369
Arnie	Anderson	ArnieAnderson@MinnCAP.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Drive, Suite 202 St. Paul, MN 55103	Paper Service	No	OFF_SL_14-369_M-14-369
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-369_M-14-369
Richard G	Burud	rburud@noblesce.com	Nobles Cooperative Electric	22636 US HIGHWAY 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_14-369_M-14-369
Executive	Director	N/A	Sustainable Resources Center	1081 10th Ave SE  Minneapolis, MN 55414	Paper Service	No	OFF_SL_14-369_M-14-369
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-369_M-14-369
Daryll	Fuentes	N/A	USG	550 W. Adams Street  Chicago, IL 60661	Paper Service	No	OFF_SL_14-369_M-14-369
Lara V	Greden	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	OFF_SL_14-369_M-14-369

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_14-369_M-14-369
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	OFF_SL_14-369_M-14-369
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-369_M-14-369
Burl	Haar	burl.haar@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101-2147	Electronic Service	No	OFF_SL_14-369_M-14-369
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_14-369_M-14-369
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	OFF_SL_14-369_M-14-369
Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_14-369_M-14-369
Joel	Johnson	joel@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_14-369_M-14-369
Paula	Johnson	paulajohnson@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-369_M-14-369
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	OFF_SL_14-369_M-14-369

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_14-369_M-14-369
Jon Erik	Kingstad	N/A	-	2725 Saddle Ct Unit E Stillwater, MN 55082-4583	Paper Service	No	OFF_SL_14-369_M-14-369
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-369_M-14-369
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-369_M-14-369
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_14-369_M-14-369
Tom	McDougall	N/A	The Weidt Group	5800 Baker Rd Minnetonka, MN 55345	Paper Service	No	OFF_SL_14-369_M-14-369
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-369_M-14-369
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-369_M-14-369
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-369_M-14-369
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-369_M-14-369

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Phillippo	jophillippo@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	PO Box 19001 Green Bay, WI 54307-9001	Electronic Service	No	OFF_SL_14-369_M-14-369
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_14-369_M-14-369
Bruce	Sayler	bruces@connexusenergy.com	Connexus Energy	14601 Ramsey Boulevard  Ransey, MN 55303	Electronic Service	No	OFF_SL_14-369_M-14-369
Kristin	Stastny	stastny.kristin@dorsey.com	Dorsey & Whitney LLP	50 South 6th Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-369_M-14-369
Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-369_M-14-369
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-369_M-14-369
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_14-369_M-14-369
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW  Rochester, MN 55901	Electronic Service	No	OFF_SL_14-369_M-14-369

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Agriesti	gagriesti@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Julie Rae	Ambach	jambach@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St  Shakopee, MN 55379	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Chesnut	gchesnut@agp.com	AG Processing Inc. a cooperative	12700 West Dodge Road PO Box 2047 Omaha, NE 681032047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N  Maple Grove, MN 553694718	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jill	Curran	jcurran@mncchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue  St. Paul, MN 55104	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jim	Erchul		Daytons Bluff Neighborhood Housing Sv.	823 E 7th St  St. Paul, MN 55106	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl  Northfield, MN 55057	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Kelsey	Genung	kelsey.genung@xcelenergy.com	Xcel Energy	414 Nicollet Mall, Fl. 6  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave.  St. Louis, MO 63102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jared	Hendricks	hendricksj@owatonnautiliti es.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Holly	Hinman	holly.r.hinman@xcelenergy .com	Xcel Energy	414 Nicollet Mall, 7th Floor  Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Karolanne	Hoffman	kmh@dairy.net.com	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227  Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Michael	Hoy	mhoy@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024-9583	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	N/A	Community Action of Minneapolis	2104 Park Ave S  Minneapolis, MN 55404	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Paula	Johnson	paulajohnson@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Joel	Johnson	joel@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW  Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE  Austin, MN 55912	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	Lepak	N/A	Arrowhead Economic Opportunity	702 S 3rd Ave  Virginia, MN 55792	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Allan	Lian	alian@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave  Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter  Kansas City, MO 64155-8513	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd  Burnsville, MN 55337	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor  Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEARResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Smilanich		Passive Concepts	228 6th Ave N  South St. Paul, MN 55075	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive  Madison, WI 53704	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401-1459	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave  Bismarck, ND 58501	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST